

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ZEN JV, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 25-11195 (JKS)

(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING
STIPULATION AND PROTECTIVE ORDER**

The undersigned proposed counsel to the Official Committee of Unsecured Creditors (the “Committee”) hereby certifies as follows:

1. On June 24, 2025, Zen JV, LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), filed voluntary petitions for relief (the “Chapter 11 Cases”) under title 11 of the United States Code (the “Bankruptcy Code”). These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

2. On July 2, 2025, the United States Trustee for Region 3 appointed the Committee, which is comprised of the following members: (i) Verinext Inc., (ii) Jobverse, Inc., (iii) Textkernel B.V., c/o Bullhorn Inc., (iv) Talroo, Inc., (v) Appcast, Inc., (vi) Jobcase, Inc., and (vii) Equinix, Inc. *See* Docket No. 65.

3. In connection with these Chapter 11 Cases, the Committee has propounded discovery requests on the Debtors.

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

4. The parties have agreed to certain terms and conditions in connection with any production of documents by the Debtors, including *inter alia* the protection from disclosure of any confidential and highly confidential information produced in connection with these Chapter 11 Cases, as set forth in the *Stipulation and Protective Order* (the “Stipulation”) appended as Exhibit 1 to the proposed form of order (the “Proposed Order”), which is attached hereto as **Exhibit A.**

WHEREFORE, it is respectfully requested that the Court enter the Proposed Order approving the Stipulation at its earliest convenience without further notice or a hearing.

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Dated: July 31, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Justin R. Alberto

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